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RED, J.E.	X	
RERA, D.W.		
NCIS, G.E.		
DWIN, R.		
NI, B.J.		
MAN, L.K.		
LY, T.J.		
KER, E.H.		
IS, J.P.		
RSH, J.M.	X	
BY, W.A.		
STER, A.W.		
EG, D.		
E, E.M.	X	
JESTIC, J.R.		
RX, G.E.		
URRENS, B.E.		
RGAN, R.V.	X	
TTER, G.L.	X	
ZUTO, V.M.		
FEELL, B.E.		
NDLIN, N.B.		
EPLER, L.R.		
ANSON, E.R.		
EBE, J.S.		
LKINSON, R.B.	X	
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CLASSIFICATION:

UCNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
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UTHORIZED CLASSIFIER SIGNATURE

DATE

IN REPLY TO LTR NO.

PC.
LTR APPROVALS:
SB: JE

ORIG & TYPIST INITIALS
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RF-46469 (Rev. 10/91)

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92-RF-1378

Robert M. Nelson, Jr.
Manager
DOE, RFO

Attn: D. P. Simonson

TRANSMITTAL OF JANUARY 24, 1992 MEETING MINUTES - JEE-0113-92

Attached are the Meeting Minutes for the OU 9 (OPWL) Phase I RFI/RI Work Plan Meeting held January 24, 1992 at the Environmental Protection Agency (EPA). The meeting was held to discuss the EPA and Colorado Department of Health comments on the Operable Unit No. 9, Original Process Waste Lines, Final Phase I RFI/RI Work Plan. These comments were submitted to DOE on January 6, 1992.

J. E. Evered, Director
Environmental Management

RTO:dmf

Orig. and 1 cc - R. M. Nelson, Jr.

Attachment:
As Stated

cc:
F. R. Lockhart - DOE, RFO
B. K. Thatcher - " "

ADMIN RECORD

A-000-000412

MEETING MINUTES

OU 9 (OPWL) Phase I RFI/RI Work Plan Meeting

January 24, 1992

The following notes document the referenced meeting and convey my interpretations of the topics discussed.

PURPOSE OF MEETING

The meeting was held to discuss CDH and EPA comments on the OU 9, Original Process Waste Lines, Final Phase I RFI/RI Work Plan. These comments were submitted to DOE on January 6, 1992.

ATTENDEES

- Arturo Duran, EPA
- Charlie Hayes, EG&G/RPD
- Randy Ogg, EG&G/RPD
- Chris Rayburn, IT
- Joe Schieffelin, CDH
- Bruce Thatcher, DOE/ER

TOPICS DISCUSSED

- DOE drafted a letter on January 23 requesting that the due date for the revised work plan be moved from February 10 to February 28. CDH and EPA verbally approved this change.

- OU 9 RFI/RI field activities tentatively will commence in mid to late March. Initial activities will include the additional OPWL data compilation task outlined in the work plan.

- DOE wants to base an example EEW for RFP production areas on OU 9. This will be presented during a scheduled EE meeting with CDH and EPA on February 21. The example EEW will be scoped essentially as a Level I assessment, entailing a site visit to evaluate environmental conditions at OU 9. If this EEW format is well received at the meeting, DOE will attempt to incorporate it into the

revised work plan for submittal on February 28. CDH and EPA approved of this approach, and indicated that the revised EEW could be submitted after February 28 if more time is needed to finalize it. If the revised EEW is not included, the existing EEW will remain in the work plan with the addition of introductory language describing the ongoing evolution of EEW scope and approach at the RFP. Similar language will also be added to the work plan introduction (Section 1.0).

- Joe Scheiffelin has drafted a letter that proposes amending the IAG to incorporate into OU 9 the eleven IHSSs identified in the work plan as redundant with OU 9. CDH currently is reviewing this letter.

- Pipeline test pit spacing and location rationale were reviewed. It was reemphasized that the 200 foot spacing based on the pipeline release model will only apply to pipelines with no known history of releases, no structural features within the 200 foot section, and no visual evidence in test pits of damage or significant corrosion. It was acknowledged that the proposed FSP most likely will not detect all small-volume releases from the pipelines. The FSP is designed to provide a reasonable and diligent effort to locate those releases which may significantly impact the environment. Pressure testing of pipelines between test pits will be used to the extent possible to evaluate nonexcavated portions of the pipeline network. CDH and EPA agree that the proposed FSP appears reasonable, but must interpret this within the context of the IAG requirements, which state that sources and soils must be fully characterized. CDH and EPA will reconsider whether the current FSP in conjunction with pipeline pressure testing meets the intent of these requirements.

- Equipment access information gathered during preparation of the work plan will be included in the work plan, possibly as an appendix.

- OPWL components beneath buildings will be evaluated during additional data compilation activities for possible partial investigation.

- The CDH surface soil sampling method does not need to be used at OU 9 if an alternate method is justifiably more appropriate. The CDH method focuses on large areas and may not be easily applicable to potential OU 9 release sites. The recently prepared OU 1 work plan addendum describes an alternate sampling method which will be reviewed for applicability to OU 9.

- PCBs and pesticides were not included in the OU 9 SAP because there is no indication that these compounds were ever introduced to the OPWL. EPA proposed analyzing for them because available data may not adequately justify excluding them. EPA will revisit this issue and notify DOE of its decision.

- The FSP will include surface radiation surveys at locations where OPWL releases are known to have impacted surface soils, including both pipeline and tank releases. Surface radiation survey methodology currently is undergoing revision by DOE and EG&G. The work plan will be revised to include the most up-to-date procedures and instrumentation based on these ongoing efforts. In addition, shifting of test pits or borings to target hot spots based on the results of pre-excavation radiation surveys will be removed from the work plan.

- CDH and EPA are still concerned that the FSP does not clearly indicate that native soils around known pipeline release sites will be sampled. The potential impact of higher versus lower native soil hydraulic conductivity on the spread of contaminants from trench fill materials into native soil was discussed. DOE suggests that hydrogeologists from CDH, EPA, and EG&G meet to discuss this issue. Sampling of native soils around pipeline trenches will be clarified in the FSP.

- The primary purpose of the Phase I IM/IRA under the IAG is to address how the OU will be closed. A second purpose is to mitigate environmental risk and further spread of contamination. To support these goals, data should be collected during the Phase I RFI/RI to evaluate closure options (i.e., clean vs. dirty closure), support calculation of risk from sources and soils, and evaluate potential for ongoing contaminant migration from sources and soils. The following revisions to the work plan were discussed:

  - Indication in the human health risk assessment plan (Section 8.0) of how calculations will be performed to determine the risk due to surface soils and the need for mitigative action under the Phase I IM/IRA.

  - Inclusion in the FSP of vadose zone monitoring techniques (e.g., tensiometer nests) at known release locations to evaluate whether soils may be impacting groundwater through remobilization of contaminants by wetting fronts.

  In addition, the work plan will more clearly indicate that the Phase I RFI/RI will fully evaluate the extent of contamination in soils, and that groundwater monitoring under the Phase II RFI/RI will further evaluate the extent of contamination and ongoing impacts from contaminated soils.

  CDH and EPA will discuss this issue further and contact DOE with any clarifications or decisions.

ACTION ITEMS

- IT CORPORATION

  - Obtain concurrence from EG&G as necessary to incorporate revisions described above and other CDH/EPA comments into the work plan.

  - Discuss with EG&G Sam Bamberg's involvement in preparing the example OU 9 EEW for the February 21 EE meeting.

- DOE/EG&G

  - Arrange meeting between appropriate representatives of DOE, EG&G, CDH, and EPA to discuss hydrogeology of RFP surficial deposits.

- CDH/EPA

  - Provide clarifications and/or decisions to DOE on the issues of: 1) OU 9 FSP ability to fulfill IAG Phase I RFI/RI requirements, 2) PCB/pesticide analysis, and 3) Phase I RFI/RI support of the Phase I IM/IRA.

cc: Randy Ogg, EG&G
Charlie Hayes, EG&G
Clayton Carney, IT
Mike Theodorakos, IT
Less Osborne, IT